



Program Requirements Comparison

NATIONAL ENVIRONMENTAL PERFORMANCE TRACK and CLEAN TEXAS LEADER



National Environmental Performance Track and Clean Texas Leader are voluntary programs designed to foster and reward environmental excellence. Performance Track is a national EPA program and Clean Texas Leader is a statewide TNRCC program. This fact sheet summarizes and compares requirements for the two programs. For additional information on these programs or incentives, see program web sites or contact program coordinators.

Common Program Requirements:

- *EMS Components:* Five required elements include: an EMS with a written policy; planned targets and goals; clear roles and responsibilities for meeting goals; plans for checking and correcting non-conformance issues; and documented management review.
- *EMS Audit:* A self-assessment or third party EMS audit is required.
- *EMS Cycle:* Requires full implementation and at least one review cycle.
- *Scalability:* Requirements are scalable and goals are expected to reflect the size of the facility.
- *Community References:* Community references are required (e.g., member of a citizen group, union, local agency).
- *Community Outreach:* Requires a plan to identify and respond to local concerns, inform community of important matters that affect it.
- *Annual Report:* Report must include EMS data and progress toward meeting goals.
- *Compliance Record:* Strong environmental compliance record required.
- *Duration of Participation:* Membership is for three years.

Clean Texas Leader - Additional Requirements:

- *Past Performance:* Requires three years of performance in a previous Clean Texas program and three years of proven environmental leadership or demonstration that the facility is state-of-the-art.
- *Future Performance:* Requires community input and approval of future commitments; development of product stewardship policy and program; and internal environmental programs for staff.
- *Compliance Record:* Facility must not have been the subject of a TNRCC Finding Order or State or Federal District Court Judgement for two years prior to membership. Facilities with any criminal violations of an environmental law are ineligible.
- *Community References:* A letter of community endorsement and a list of community partners are required.
- *Community Outreach:* Facility must ensure two-way and open communication, including four meetings per year. Facilities must sponsor local environmental programs.

Web Site: www.cleantexas.org
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Performance Track - Additional Requirements:

- *Past Performance:* Requires a demonstration of two years of performance improvements within two specific aspects (e.g., water use, hazardous waste reduction, emissions of VOCs). Small businesses need only report on one aspect.
- *Future Performance:* Requires a commitment to future performance improvements in four specific aspects. Small businesses commit to only two aspects.
- *Annual Report:* Summary results of compliance audits and corrective action must be included.
- *Compliance Record:* Facility must have fewer than three significant civil violations and no unresolved SNCs/SVs, as well as no criminal environmental violations for five years. Facilities with ongoing EPA litigation or EPA debarment are ineligible.
- *Self-Certification:* Compliance self-certification is required on application and on annual reports.
- *Self-Audits:* Annual EMS and compliance audits are required.
- *Site Visits:* Periodic site visits are conducted as part of the program.

Web Site: www.epa.gov/performance-track
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